

AUSA Maureen E. Merin (312) 353-1457

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

AFFIDAVIT OF INDICTMENT IN REMOVAL PROCEEDINGS

UNITED STATES OF AMERICA)

NORTHERN DISTRICT OF ILLINOIS)


MAGISTRATE JUDGE SCHENKIER

CASE NUMBER

08CR 457

The undersigned Affiant personally appeared before Sidney I. Schenkier, a United States Magistrate Judge, and being duly sworn on oath, states: That at Spokane, Washington (U.S. District Court for the Eastern District of Washington), on or about January 23, 2008, one ELVEDIN BILANOVIC was charged with violations of Title 18, United States Code, Section 1341, for the offense of mail fraud, Title 18, United States Code, Section 1342, for the offense of using fictitious names or addresses for the purpose of carrying on mail fraud, and Title 18, United States Code, Section 1349, for the offense of conspiracy to commit mail fraud; and that on the basis of Affiant's investigation and information received concerning the case through official channels, does hereby certify that an Arrest Warrant is outstanding for the arrest of said defendant (attached hereto).

Wherefore, Affiant prays that the defendant be dealt with according to law.


STEVE FARINA, Special Agent
Federal Bureau of Investigation

Subscribed and Sworn to before me this
4th day of June, 2008.


Sidney I. Schenkier
United States Magistrate Judge

FILED
6-4-08
JUN - 4 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

Bond set [or recommended] by issuing Court at no bond - AUSA seeks detention

RETURN TO CLERK USDC
P.O. BOX 1493
SPOKANE, WA 99210 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA

Plaintiff (s)

v.

ELVEDIN BILANOVIC

Defendant (s)

WARRANT FOR ARREST

Case Number: CR-08-10-EFS-5

To: The United States Marshal and any Authorized U.S. Officer

YOU ARE HEREBY COMMANDED to arrest ELVEDIN BILANOVIC

and bring him or her forthwith to the nearest Magistrate Judge to answer a(n) indictment
charging him or her with violation of:

18 USC 1341 and 2 MAIL FRAUD

18 USC 1349 CONSPIRACY TO COMMIT MAIL FRAUD

JAMES R. LARSEN

CLERK, U.S. DISTRICT COURT

by: Renee Demers
Deputy Clerk

January 23, 2008

at Spokane, WA

MAIL FORGED AT AUSA seeks Detention
BY HONORABLE MAGISTRATE JUDGE CYNTHIA IMBROGNO

This warrant was received and executed with the arrest of the above-named defendant		
Date Received	Name and Title of Arresting Officer	Signature of Arresting Officer
Date of Arrest		

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 23 2008

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANO MILOVANOVIC,
TONY GENE LAMB,
ISMAIL HOT,
MUHAMED KOVACIC,
ELVEDIN BILANOVIC, and
ALKSANDAR DJORDJEVIC,

Defendants.

CR-08-0010-EFS

Order Sealing Indictments

Upon motion by the Government,

IT IS ORDERED that the Indictments be sealed by the Clerk of Court until
further order of the Court or upon Defendant's arrest, whichever comes first.

DATED this 23rd day of January, 2008.


CYNTHIA IMBROGNO
United States Magistrate Judge

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JAN 23 2008

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

1 James A. McDevitt
2 United States Attorney
3 Eastern District of Washington
4 Joseph H. Harrington
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

SEALED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,
10 Plaintiff,

11 vs.

12 BRANO MILOVANOVIC,
13 TONY GENE LAMB,
14 ISMAIL HOT,
15 MUHAMED KOVACIC,
16 ELYEDIN BILANOVIC, and
17 ALKSANDAR DJORDJEVIC,

18 Defendants.

CR-08-0010-EFS

INDICTMENT

Vio: 18 U.S.C. §§ 1341 and 2
Mail Fraud (Counts 1-4)

18 U.S.C. § 1349
Conspiracy to Commit
Mail Fraud (Count 5)

19 The Grand Jury Charges:

General Allegations

20 A. *Individuals and Entities*

21 1. The Washington State Department of Licensing ("DOL") is a state
22 agency responsible for, among other thing, administering the licensing of drivers,
23 vehicles, vessels, and various professionals in the State of Washington. Included
24 in these responsibilities is the execution of regulatory testing for applicants
25 seeking a commercial driver's license ("CDL"). The DOL's main office is located
26 in Olympia, Washington, with smaller offices located throughout the State of
27 Washington, including Spokane, Washington.

28 2. The Digimarc Corporation is an entity that is contracted with the
DOL to manufacture CDLs on the DOL's behalf and to mail official Washington

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1 CDLs to successful applicants. The Digizarc Corporation is located in Lacey,
2 Washington.

3 3. BRANO MILOVANOVIC is a bi-lingual English / Bosnian speaker
4 who at all times relevant to this Indictment resided in Spokane, Washington.

5 4. TONY GENE LAMB was, at all time relevant to this Indictment,
6 contracted with the State of Washington, and certified by the DOL, to administer
7 driving skills test for CDL applicants. At all times relevant to this Indictment
8 TONY GENE LAMB resided in Spokane, Washington.

9 5. ISMAIL HOT is a Bosnian speaker who, at all times relevant to this
10 Indictment, resided in Chicago, Illinois.

11 6. MUHAMED KOVACIC is a Bosnian speaker who, at all times
12 relevant to this Indictment, resided in Chicago, Illinois.

13 7. ELVEDIN BILANOVIC is a Bosnian speaker who, at all times
14 relevant to this Indictment, resided in the Grand Rapids and Caledonia, Michigan
15 areas.

16 8. ALEKSANDAR DJORDJEVIC is a Bosnian speaker who, at all
17 times relevant to this Indictment, resided in the Chicago, Illinois and Griffin,
18 Indiana areas.

19 *B. Background on Obtaining a Commercial Driver's License in Washington*

20 9. To obtain a Commercial Driver's License ("CDL") in the State of
21 Washington, an applicant must meet two requirements prior to being eligible to
22 apply for a CDL. First, an applicant must be a resident of the State of
23 Washington, although, at all times relevant to this Indictment, Washington only
24 required a verbal declaration of residency, not actual documentation. Second, an
25 applicant must have previously obtained a Washington personal drivers license
26 ("PDL"). After meeting these two requirements, an applicant may take the CDL
27 test.

28 10. The CDL test consists of two parts -- a written exam and a skills test.

1 The written exam (commonly referred to as the "knowledge test") is the first part
2 of a CDL test. The written exam is administered by the Washington State
3 Department of Licensing ("DOL") at a local DOL office. The written exam tests
4 an applicant's knowledge of the rules and regulations for driving commercial
5 vehicles. At all times relevant to this Indictment, an applicant not proficient in the
6 English language was entitled to have an interpreter of his or her choosing present
7 during the written exam to translate the exam into his or her native language.

8 11. If an applicant successfully passes the written exam, the applicant
9 must then successfully pass the skills test (commonly referred to as the "driving
10 test"). The skills test is administered by a third-party tester. According to the
11 DOL's *Commercial Driver Guide*, the skills test, which is administered by a third-
12 party tester, consists of three sections: (1) a pre-trip inspection; (2) a road test; and
13 (3) a basic controls test. According to the DOL Guide, it normally takes
14 "approximately an hour and a half to two hours to complete all three of these
15 tests."

16 Third-Party Testers

17 12. While third-party testers are considered contractors with the State of
18 Washington and are certified by the DOL to administer the skills test, they are not
19 DOL employees and thus are subject to less oversight by the DOL.

20 13. Third-party testers are required by DOL to maintain a CDL Tester
21 Log (form 520-321). In this log, a third-party tester is required to document the
22 date the skills test was given, the start and end time of the test, the score received,
23 and the name and drivers license number of the applicant. Once a month, the
24 third-party testers either mail or fax their completed tester logs to DOL in
25 Olympia, Washington. The mailing address is P.O. Box 9030, Olympia,
26 Washington 98507.

27 Completed CDL Applications are Mailed to DOL in Olympia, WA

28 14. Upon successfully passing the CDL skills test, the third-party tester

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1 and the applicant complete and sign a document known as a "Skills Test Results"
2 or Form DLE-520-320. This form indicates the applicant successfully completed
3 the three sections of the skills test. An applicant then takes the completed DLE-
4 520-320 Form to a local DOL office and, after paying the requisite fees, receives a
5 temporary CDL. The completed CDL application is sent from the local DOL
6 office via the U.S. Mails to the DOL in Olympia, Washington. Upon receipt in
7 Olympia, the hard copies are electronically imaged by the Image Processing Unit
8 and maintained by the DOL.

9 15. In addition, on approximately a daily basis completed CDL
10 applications are scanned at the local DOL offices and the information is uploaded
11 as a batch into a DOL database called the Driver Field System. This database
12 provides the information to the Central Issuance System (CIS), which system is
13 managed by Digimarc Corporation. Digimarc, which is located in Lacey,
14 Washington, manufactures PDLs and CDLs for the State of Washington. After the
15 licenses are manufactured, Digimarc mails the licenses via pre-sorted first class
16 U.S. Mail, to the address listed on the license application.

17 C. *Spokane Addresses Where Multiple CDLs Have Been Mailed*

18 16. According to the DOL records, during approximately the past 36
19 months, multiple CDLs have been issued and mailed to multiple individuals listing
20 particular addresses in Spokane, Washington:

21 approximately 40 CDLs to individuals listing the address 6619 N. Leo,
22 Spokane, Washington;

23 approximately 21 CDLs to individuals listing the address 6423 N. Altamont,
24 Spokane, Washington;

25 approximately 6 CDLs to individuals listing the address 3626 N. Ralph
26 Street, Spokane, Washington;

27 approximately 8 CDLs to individuals listing the address 727 W. Glass, Apt.
28 10, Spokane, Washington;

approximately 10 CDLs to individuals listing the address 3614 N. Ferrall,
Spokane, Washington; and

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1 approximately 7 CDLs to individuals listing the address 3903 E. 35th Street,
2 Spokane, Washington.

3 Purpose of the Scheme and Artifice

4 17. BRANO MILOVANOVIC, TONY GENE LAMB, ISMAIL HOT,
5 MUHAMED KOVACIC, ELVEDIN BILANOVIC, and ALEKSANDAR
6 DJORDJEVIC devised a scheme and artifice, in which the mails were caused to be
7 used, to defraud and deceive the Washington Department of Licensing (DOL) by
8 obtaining CDLs through materially false and fraudulent misrepresentations and
9 omissions based on CDL applications supported by successful CDL written
10 examinations that resulted from cheating on the exam, by signed Form DLE-520-
11 320 reflecting the successful completion of a skills test when no such test was
12 completed, and by using in-state addresses in Spokane, Washington when the
13 applicant in fact resided out of state.

14 The Scheme and Artifice

15 18. It was part of the scheme and artifice that BRANO MILOVANOVIC,
16 a Bosnian speaker, contacted other Bosnian-speaking individuals residing outside
17 the State of Washington advising them that he could obtain a CDL for the
18 individuals if they traveled to Spokane, Washington and paid him approximately
19 \$2,500.

20 19. It was further part of the scheme and artifice that BRANO
21 MILOVANOVIC acted as an interpreter for Bosnian-speaking applicants taking
22 the CDL written exam and that BRANO MILOVANOVIC helped the applicants
23 cheat on the exam by telling the individuals, or using hand signals to identify, the
24 correct answers to the exam questions during the examination.

25 20. It was further part of the scheme and artifice that, once a applicant
26 passed the written exam, BRANO MILOVANOVIC would contact TONY GENE
27 LAMB, a third-party tester who maintained CDL testing logs, and paid him
28 approximately \$200 to \$500 to falsify the skills test for the applicants.

21. It was further part of the scheme and artifice that TONY GENE

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1 LAMB would either mail or fax his falsified CDL testing logs to the DOL in
2 Olympia, Washington purportedly to remain in compliance with the DOL rules
3 and regulations.

4 22. It was further part of the scheme and artifice that every time TONY
5 GENE LAMB tested Bosnian-speaking applicants arranged by BRANO
6 MILOVANOVIC the skills test was falsified.

7 23. It was further part of the scheme and artifice that TONY GENE
8 LAMB routinely noted in his CDL Tester Logs that the Bosnian-speaking
9 applicants had taken the skills test twice, having failed the first time in an effort to
10 make his logs appear legitimate to the DOL auditors.

11 24. It was further part of the scheme and artifice that TONY GENE
12 LAMB was the third-party tester for ISMAIL HOT, a Bosnian-speaking applicant,
13 and that, on or about September 27, 2006, TONY GENE LAMB and ISMAIL
14 HOT completed and sign a document known as a "Skills Test Results" or Form
15 DLE-520-320 indicating ISMAIL HOT successfully completed the three sections
16 of the skills test when, in fact, the test was neither conducted nor successfully
17 completed.

18 25. It was further part of the scheme and artifice that BRANO
19 MILOVANOVIC paid TONY GENE LAMB approximately \$200 to \$500 to
20 falsify the skills test for ISMAIL HOT.

21 26. It was further part of the scheme and artifice that, on or about October
22 1, 2006, just prior to taking a return flight to Chicago, Illinois where ISMAIL
23 HOT has lived since approximately 2001 and here he presently resides, ISMAIL
24 HOT told law enforcement officers that was originally from Bosnia-Herzegovina
25 but was residing in the Chicago, Illinois area and that he had traveled to Spokane,
26 Washington for a six-day visit with a Bosnian friend who lived at 3903 E. 35th
27 Avenue in Spokane.

28 27. It was further part of the scheme and artifice that, on or about

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1 September 28, 2006, in Spokane, Washington, ISMAIL HOT applied for and
2 received a Washington State PDL, and that, on or about September 30, 2006,
3 ISMAIL HOT applied for and received a temporary CDL after purportedly
4 successfully completing the CLD written exam and skills test.

5 28. It was further part of the scheme and artifice that, on his applications
6 for the PDL and the CDL, ISMAIL HOT listed his residence as being 3903 E. 35th
7 Avenue, Spokane, Washington.

8 29. It was further part of the scheme and artifice that, on or about October
9 4, 2006, Digimarc Corporation, on behalf of the DOL, mailed a permanent CDL in
10 the name of ISMAIL HOT from Lacey, Washington to 3903 E. 35th Avenue,
11 Spokane, Washington.

12 30. It was further part of the scheme and artifice that TONY GENE
13 LAMB was the third-party tester for MUHAMED KOVACIC, a Bosnian-speaking
14 applicant, and that, on or about September 27, 2006, TONY GENE LAMB and
15 MUHAMED KOVACIC completed and sign a document known as a "Skills Test
16 Results" or Form DLE-520-320 indicating MUHAMED KOVACIC successfully
17 completed the three sections of the skills test when, in fact, the test was neither
18 conducted nor successfully completed.

19 31. It was further part of the scheme and artifice that BRANO
20 MILOVANOVIC paid TONY GENE LAMB approximately \$200 to \$500 to
21 falsify the skills test for MUHAMED KOVACIC.

22 32. It was further part of the scheme and artifice that, on or about October
23 1, 2006, just prior to taking a return flight to Chicago, Illinois where MUHAMED
24 KOVACIC has lived since approximately 2002 and here he presently resides,
25 MUHAMED KOVACIC told law enforcement officers that was originally from
26 Bosnia but was residing in the Chicago, Illinois area and that he had traveled to
27 Spokane, Washington for a six-day visit with friends.

28 33. It was further part of the scheme and artifice that, on or about

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1 September 26, 2006, in Spokane, Washington, MUHAMED KOVACIC applied
2 and received a Washington State PDL, and that, on or about September 27, 2006,
3 MUHAMED KOVACIC applied for and thereafter received a temporary CDL
4 after purportedly successfully completing the CLD written exam and skills test.

5 34. It was further part of the scheme and artifice that, on his applications
6 for the PDL and the CDL, MUHAMED KOVACIC listed his residence as being
7 3614 N. Ferrall, Spokane, Washington.

8 35. It was further part of the scheme and artifice that, on or about October
9 4, 2006, Digimarc Corporation, on behalf of the DOL, mailed a permanent CDL in
10 the name of MUHAMED KOVACIC from Lacey, Washington to 3614 N. Ferrall,
11 Spokane, Washington.

12 36. It was further part of the scheme and artifice that, on or about
13 December 12, 2006, ELVEDIN BILANOVIC, a Bosnian-speaking CDL applicant,
14 traveled from his residence in Michigan state, where he has maintained his
15 residence since 2003, to Spokane, Washington to obtain a Washington CDL with
16 BRANO MILOVANOVIC's assistance.

17 37. It was further part of the scheme and artifice that, on or about
18 December 12, 2006, ELVEDIN BILANOVIC successfully passed the written
19 CDL exam after BRANO MILOVANOVIC, who accompanied ELVEDIN
20 BILANOVIC during the test, interpreted the exam and identified the correct
21 answers for ELVEDIN BILANOVIC.

22 38. It was further part of the scheme and artifice that TONY GENE
23 LAMB was the third-party tester for ELVEDIN BILANOVIC, and that, on or
24 about December 14, 2006, TONY GENE LAMB and ELVEDIN BILANOVIC
25 completed and sign a document known as a "Skills Test Results" or Form DLE-
26 520-320 indicating ELVEDIN BILANOVIC successfully completed the three
27 sections of the skills test when, in fact, the test was neither conducted nor
28 successfully completed.

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1 39. It was further part of the scheme and artifice that BRANO
2 MILOVANOVIC paid TONY GENE LAMB approximately \$200 to \$500 to
3 falsify the skills test for ELVEDIN BILANOVIC.

4 40. It was further part of the scheme and artifice that, on or about
5 December 14, 2006, in Spokane, Washington, ELVEDIN BILANOVIC applied
6 for and thereafter received a temporary CDL, after purportedly successfully
7 completing the CLD written exam and skills test.

8 41. It was further part of the scheme and artifice that, on his application
9 for the CDL, ELVEDIN BILANOVIC listed his residence as being 6423 N.
10 Altamont St., Spokane, Washington.

11 42. It was further part of the scheme and artifice that, on or about
12 December 22, 2006, Digimarc Corporation, on behalf of the DOL, mailed a
13 permanent CDL in the name of ELVEDIN BILANOVIC from Lacey, Washington
14 to a mailing address of 6619 N. Lea, Spokane, Washington.

15 43. It was further part of the scheme and artifice that on or about January
16 8, 2007, ELVEDIN BILANOVIC submitted to the DOL a signed Driving Record
17 Request form (DR-552-002) requesting that his driving records be mailed to EDO
18 Trucking LLC in Caledonia, Michigan.

19 44. It was further part of the scheme and artifice that, on or about January
20 9, 2007, ALEKSANDAR DJORDJEVIC, a Bosnian-speaking CDL applicant,
21 traveled from Michigan state, where he resided at the time, to Spokane,
22 Washington to obtain a Washington CDL with BRANO MILOVANOVIC's
23 assistance.

24 45. It was further part of the scheme and artifice that TONY GENE
25 LAMB was the third-party tester for ALEKSANDAR DJORDJEVIC, and that, on
26 or about January 11, 2007, TONY GENE LAMB and ALEKSANDAR
27 DJORDJEVIC completed and sign a document known as a "Skills Test Results"
28 or Form DLE-520-320 indicating ALEKSANDAR DJORDJEVIC successfully

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1 completed the three sections of the skills test when, in fact, the test was neither
2 conducted nor successfully completed.

3 46. It was further part of the scheme and artifice that BRANO
4 MILOVANOVIC paid TONY GENE LAMB approximately \$200 to \$500 to
5 falsify the skills test for ALEKSANDAR DJORDJEVIC.

6 47. It was further part of the scheme and artifice that, on or about January
7 11, 2007, in Spokane, Washington, ALEKSANDAR DJORDJEVIC applied for
8 and thereafter received a temporary CDL, after purportedly successfully
9 completing the CLD written exam and skills test.

10 48. It was further part of the scheme and artifice that, on his application
11 for the CDL, ALEKSANDAR DJORDJEVIC listed his residence as being 727 W.
12 Glass, No. 10, Spokane, Washington.

13 49. It was further part of the scheme and artifice that, on or about January
14 17, 2007, Digimarc Corporation, on behalf of the DOL, mailed a permanent CDL
15 in the name of ALEKSANDAR DJORDJEVIC from Lacey, Washington to 727
16 W. Glass, No. 10, Spokane, Washington.

17 COUNT 1

18 The Grand Jury repeats and realleges Paragraphs 1-29 of this Indictment as
19 if fully set forth herein.

20 On or about September 30, 2006, in the Eastern District of Washington,
21 BRANO MILOVANOVIC, TONY GENE LAMB, and ISMAIL HOT, for the
22 purpose of executing the aforesaid scheme and artifice to defraud and attempting
23 to so do, did knowingly and with intent to defraud cause to be transmitted in the
24 United States mail on or about October 4, 2006, an official Washington State
25 commercial driver's license from Digimarc Corporation in Lacey, Washington to
26 ISMAIL HOT at 3903 E. 35th Avenue, Spokane, Washington, based on materially
27 false and fraudulent misrepresentations and omissions, in violation of 18 U.S.C.
28 1341 and 2.

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COUNT 2

The Grand Jury repeats and realleges Paragraphs 1-23 and 30-35 of this Indictment as if fully set forth herein.

On or about September 27, 2006, in the Eastern District of Washington, BRANO MILOVANOVIC, TONY GENE LAMB, and MUHAMED KOVACIC, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to so do, did knowingly and with the intent to defraud cause to be transmitted in the United States mail on or about October 4, 2006, an official Washington State commercial driver's license from Digimarc Corporation in Lacey, Washington to MUHAMED KOVACIC at 3614 N. Ferrall, Spokane, Washington, based on materially false and fraudulent misrepresentations and omissions, in violation of 18 U.S.C. 1341 and 2.

COUNT 3

The Grand Jury repeats and realleges Paragraphs 1-23 and 36-43 of this Indictment as if fully set forth herein.

On or about December 14, 2006, in the Eastern District of Washington, BRANO MILOVANOVIC, TONY GENE LAMB, and ELVEDIN BILANOVIC, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to so do, did knowingly and with the intent to defraud cause to be transmitted in the United States mail on or about December 22, 2006, an official Washington State commercial driver's license from Digimarc Corporation in Lacey, Washington to ELVEDIN BILANOVIC at 6619 N. Lee, Spokane Washington, based on materially false and fraudulent misrepresentations and omissions, in violation of 18 U.S.C. 1341 and 2.

COUNT 4

The Grand Jury repeats and realleges Paragraphs 1-23 and 44-49 of this Indictment as if fully set forth herein.

On or about January 11, 2007, in the Eastern District of Washington,

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1 BRANO MILOVANOVIC, TONY GENE LAMB, and ALEKSANDAR
2 DJORDJEVIC, for the purpose of executing the aforesaid scheme and artifice to
3 defraud and attempting to so do, did knowingly and with the intent to defraud
4 cause to be transmitted in the United States mail on or about January 17, 2007, an
5 official Washington State commercial driver's license from Digimarc Corporation
6 in Lacey, Washington to ALEKSANDAR DJORDJEVIC at 727 W. Glass, No. 10,
7 Spokane, Washington, based on materially false and fraudulent misrepresentations
8 and omissions, in violation of 18 U.S.C. 1341 and 2

9
10 **COUNT 5**

11 The Grand Jury repeats and realleges Paragraphs 1-16 of this Indictment as
12 if fully set forth herein.

13 Beginning on a date unknown to the Grand Jury but by no later than on or
14 about September 24, 2006, and continuing until on or about January 17, 2007, in
15 the Eastern District of Washington, BRANO MILOVANOVIC, TONY GENE
16 LAMB, ISMAIL HOT, MUHAMED KOVACIC, ELVEDIN BILANOVIC, and
17 ALEKSANDAR DJORDJEVIC did knowingly combine, conspire, confederate
18 and agreed together and with each other, to commit offenses against the United
19 States, to wit: mail fraud in violation of 18 U.S.C. § 1341, by executing a scheme
20 and artifice, in which the mails were caused to be used, to defraud and deceive the
21 DOL by obtaining CDLs through materially false and fraudulent
22 misrepresentations and omissions in CDL applications.

23 **Manner and Means of the Conspiracy**

24 BRANO MILOVANOVIC, TONY GENE LAMB, ISMAIL HOT,
25 MUHAMED KOVACIC, ELVEDIN BILANOVIC, and ALEKSANDAR
26 DJORDJEVIC knowingly and with the intent to defraud caused CDL applications
27 to be submitted to the DOL, which applications were supported by successful CDL
28 written examinations that resulted from cheating on the exam, by signed Form
DLE-520-320 reflecting the successful completion of a skills test when no such

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1 test was completed, and by using in-state addresses in Spokane, Washington when
2 the applicant in fact resided out of state.

3 Overt Acts

4 The Grand Jury repeats and realleges Paragraphs 18-49 of this Indictment as
5 if fully set forth herein.

6 All in violation of 18 U.S.C. § 1349.

7
8 DATED this 23 day of January, 2008.

9
10 A TRUE BILL

11 
12 FOR

13 
14 James A. McDevitt
United States Attorney

15 
16 Joseph H. Harrington
Assistant United States Attorney